

1 KAMALA D. HARRIS
Attorney General of California
2 ARTHUR D. TAGGART
Supervising Deputy Attorney General
3 BRIAN S. TURNER
Deputy Attorney General
4 State Bar No. 108991
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 445-0603
Facsimile: (916) 327-8643
7 *Attorneys for Complainant*

8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. **2013-78**

12 **SUSAN D. BOUDRO**
13 **3 Thompson Place**
Red Bluff, CA 96080

A C C U S A T I O N

14 **Registered Nurse License No. 374386**

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
20 official capacity as Interim Executive Officer of the Board of Registered Nursing ("Board"),
21 Department of Consumer Affairs.

22 **Registered Nurse License**

23 2. On or about August 31, 1984, the Board issued Registered Nurse License Number
24 374386 to Susan D. Boudro ("Respondent"). The registered nurse license was in full force and
25 effect at all times relevant to the charges brought herein and will expire on July 31, 2014, unless
26 renewed.

27 ///

28 ///

1

2

6

0

1

2

3

4

6

3

9

5

6

3

1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
2 enforcement of the case.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Criminal Conviction)**

5 8. Respondent is subject to discipline pursuant to Code section 2761, subdivision (f), in
6 that Respondent has been convicted of the following crime that is substantially related to the
7 qualifications, functions, or duties of a registered nurse:

8 a. On or about August 20, 2008, in the Superior Court, County of Glenn, California in
9 the matter entitled *People vs. Susan Dee Boudro*, 2008, Case No. 08NCR06187, Respondent was
10 found guilty by the court of a violation of Vehicle Code section 23152, subdivision (a) (driving
11 under the influence of a drug), a misdemeanor. The circumstances of the crime are that on
12 January 20, 2008, Respondent was arrested for driving under the influence of a drug after her
13 vehicle collided with a guard rail.

14 **SECOND CAUSE FOR DISCIPLINE**

15 **(Use a Drug to an Extent or in a Manner Dangerous or Injurious to Herself)**

16 9. Respondent is subject to discipline pursuant to Code section 2761, subdivision (a), on
17 the grounds of unprofessional conduct, as defined in Code section 2762, subdivision (b), in that
18 Respondent used a drug to an extent or in a manner dangerous or injurious to herself or others.

19 **PRAYER**

20 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
21 and that following the hearing, the Board of Registered Nursing issue a decision:

22 1. Revoking or suspending Registered Nurse License Number 374386, issued to Susan
23 D. Boudro;

24 2. Ordering Susan D. Boudro to pay the Board of Registered Nursing the reasonable
25 costs of the investigation and enforcement of this case, pursuant to Business and Professions
26 Code section 125.3; and,


27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3. Taking such other and further action as deemed necessary and proper.

DATED: 7/24/12

for 
LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

SA2012104706
10906178.doc